IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ICONTROL NETWORKS, INC., a Delaware corporation, **Plaintiff,** **v.** **ZONOFF INC., a Delaware corporation,** **Defendant.**	**CIVIL ACTION** **NO. 1:14-CV-1199-GMS**

ZONOFF INC.'S MOTION TO DISMISS PLAINTIFF'S FIRST AMENDED COMPLAINT AND FOR A MORE DEFINITE STATEMENT

Pursuant to Rule 12(b)(6) and 12(e) of the Federal Rules of Civil Procedure, and for the reasons set forth in the accompanying memorandum in support hereof, defendant Zonoff Inc. ("Zonoff") respectfully moves the Court to dismiss plaintiff iControl Networks, Inc.'s ("iControl") claims for indirect infringement, to dismiss iControl's claims of infringement of method claims, to dismiss iControl's claim for damages, and, if the claims of indirect infringement are not dismissed altogether, to require a more definite statement identifying the specific claims of the six patents-in-suit that are asserted as being actually indirectly infringed by Zonoff.

DATED: December 2, 2014

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CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of December, 2014, a copy of the foregoing Zonoff Inc.'s Motion To Dismiss Plaintiff's First Amended Complaint And For A More Definite Statement is being served via Hand Delivery to:

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